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FACT SHEET

DRAFT CONTROL TECHNIQUE GUIDELINES AND PROPOSED AMENDMENTS TO THE AIR TOXICS STANDARD FOR AEROSPACE MANUFACTURING AND REWORK FACILITIES

TODAY'S ACTION...

- ◆ The Environmental Protection Agency (EPA) is proposing amendments to the final air toxics standard for aerospace manufacturing and rework facilities, which was issued in July 1995 and published in the Federal Register on September 1, 1995. EPA believes that the proposed amendments will provide affected industry sources with a more streamlined and flexible regulation while still providing strong environmental protection.
- ◆ EPA is also announcing the availability of a draft control technique guidelines (CTG) document for controlling volatile organic compound (VOC) emissions from aerospace manufacturing and rework facilities.

BACKGROUND

- ◆ EPA's final air toxics regulation for aerospace manufacturing and rework facilities was developed through extensive negotiations with industry representatives, environmental groups, and State and local agencies.
- ◆ EPA's final rule will reduce emissions of air toxics, including chromium--a pollutant strongly suspected of causing lung cancer, and volatile organic compounds (VOCs) by 123,000 tons annually. This represents a 60 percent reduction from current levels. Air toxics are those pollutants known or suspected of causing cancer or other serious health effects (e.g. reproductive effects and birth defects). VOCs contribute significantly to ground-level ozone, or smog.
- ◆ Emissions of hazardous air pollutants are released from these facilities during topcoat and primer application operations, cleaning operations, chemical milling maskant application operations, and the chemical depainting (stripping) of aerospace vehicles and components.

PROPOSED AMENDMENTS TO EPA'S AIR TOXICS REGULATION FOR
AEROSPACE MANUFACTURING AND REWORK FACILITIES

- ◆ Based on continued discussions with industry stakeholders, EPA is proposing to expand pollution prevention and control options in the rule to provide affected sources with added flexibility in the choice of emission control approaches.

The proposed amendments include:

- 1) Corrections to several references in the rule.
- 2) Revisions and additions to definitions.
- 3) Clarification of the applicability of the cleaning operations standards.
- 4) Clarification of the applicability of the rule to space vehicles.
- 5) Addition of standards for Type I chemical milling maskants.
- 6) Revision of standards for new and existing sources using dry particulate filters to control emissions from topcoat and primer application and depainting operations.
- 7) Addition of a test method for determining the filtration efficiency of dry particulate filters.
- 8) Addition of an exemption for certain water-reducible coatings.
- 9) Addition of an essential use exemption for cleaning solvents.
- 10) Clarification of compliance dates.
- 11) Clarification of the applicability of new source MACT to spray booth standards.
- 12) Clarification of the requirements for new and existing primer and topcoat application operations.

13) Clarification of monitoring requirements for dry particulate filter usage.

14) Addition of a cross reference to requirements in the air toxics General Provisions regulation (subpart A of part 63.)

CONTROL TECHNIQUES GUIDELINE

- ◆ The Clean Air Act Amendments of 1990 require that State implementation plans for certain ozone nonattainment areas be revised to require the implementation of reasonably available control technology (RACT) to control VOC emissions.
- ◆ EPA's draft CTG document addresses reasonably available control technologies for control of VOC emissions from coating operations at aerospace manufacturing and rework operations.
- ◆ VOC emissions from primer, topcoat, and "specialty" coating application, maskant application, sealing, and cleaning operations are addressed in the CTG. Emission limits for processes addressed by both the CTG and the air toxics standard are identical. The CTG contains new requirements on sealants, adhesives, and specialty coatings not covered by the air toxics rule.

FOR FURTHER INFORMATION...

- ◆ Anyone with a computer and a modem can download the proposed amendments and the CTG from the Clean Air Act Amendments bulletin board (look under "Recently Signed Rules" for the proposed amendments and "Title I, Policy and Guidance Documents" for the CTG) of EPA's electronic Technology Transfer Network (TTN) by calling (919) 541-5742. For further information about how to access the board, call (919) 541-5384. For further information about the proposed amendments and CTG, contact Jim Szykman at (919) 541-2452.